

### **REMARKS/ARGUMENTS**

Claims 1-18 are pending. Claims 1, 10 and 18 are amended for clarification. No range of equivalents is intended to be surrendered by these non-narrowing amendments. No new matter is introduced. Reconsideration and prompt allowance of the claims is respectfully requested.

#### **35 U.S.C. § 102 Rejections**

Claims 1-8, 10-16 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Pre-Grant Publication No. 20040193912 to Li et al. ("Li"). Applicants respectfully traverse this rejection since each and every element of these claims are not expressly or inherently described in Li.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); see also MPEP § 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. In re Bond, 15 USPQ2d 1566 (Fed. Cir. 1990). As stated, Li does not show each and every element as set forth in the claims, does not suggest the identical invention as defined in the claims, and does not suggest the elements arranged as required by the claims.

For example, Li does not show "a plurality of device-agnostic policy implementation, in which the device-agnostic policy implementations include non-security policy implementations," as recited in claim 1. Li does not disclose non-security policies and is, indeed, limited to security policies. Li also does not teach "a plurality of device translators, each device translator corresponding to a respective one of said plurality of network devices *and one of said plurality of device-agnostic policy implementations*," as recited in claim 1 (emphasis added). The policy decision translators in Li do not correspond to one of said plurality of network devices. The policy decision translators in Li do not correspond to one of said plurality of device-agnostic policy implementations. Consequently, claim 1 is not anticipated by Li. Independent claims 10 and 18 include similar language and are, therefore, not anticipated by Li at least these same reasons.

Dependent claims 2-8 and 11-16 are not anticipated by Li for at least these same reasons and the independent features they disclose. Consequently, claims 1-8, 11-16 and 18 are allowable.

### 35 U.S.C. § 103 Rejections

Claims 9 and 17 are rejected under 35 U.S.C. § 103(a) as being rendered obvious by Li in view of U.S. Pre-grant publication No. 20050160361 to Young ("Young"). Applicants respectfully traverse this rejection since each and every element of these claims are not taught or suggested by Li and Young.

Young does not overcome the defects of Li described above with regards to independent claims 1 and 10. Claims 9 and 17, which depend on claims 1 and 10, respectively, are not rendered obvious, therefore, for at least these same reasons and the independent features they recite. Therefore, claims 9 and 17 are allowable.

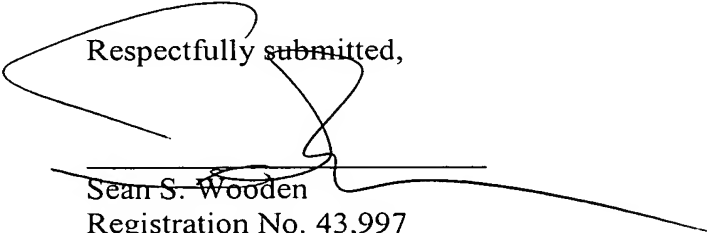
### CONCLUSION

In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance. Prompt examination and allowance are respectfully requested.

Should the Examiner believe that anything further is desired in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

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Respectfully submitted,

  
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